

Honorable Members of the FCC,

Following are some expressions of serious concern about proposals regarding Community Advisory Boards and other compliance burdens proposed by the Commission in MB Docket No. 04-233.

Community Advisory Boards will do little to solve any real problem.

Problems of format 'sameness' and lack of local interest have been exacerbated by diminishing local ownership of stations more than by any neglect of broadcast obligations by most community based licensees.

Attempting to equally represent "all segments of the community will tend toward more 'sameness' of stations and less uniqueness and variety. To demonstrate genuine local interest does not imply covering all points of interest to the community, but it assumes that some station personnel must have a real connection with the community which is apparent via the format. A station which generates little complaint about what it does or does not do should be presumed to be satisfying listener interests.

Compelling a station to include or remove format elements unnecessarily imposes upon an established relationship between a station and its listeners.

The validity of a station's format and function is better demonstrated by other means than Community Advisory Boards. The validity of the format is demonstrated by the station's financial viability, which is evidenced by the continuity of the station, and by management's commitment to the station's purpose and format which, especially in smaller operations, often represents a higher motive than simply optimizing revenue. The validity of the station's format is also demonstrated by the dedication and support of its listeners; some stations (commercial and non-commercial) function almost entirely with revenue from listeners, coming directly or through listener-supported programs. Our station, though technically "commercial" derives most operating revenue through such listener-supported programs and relies very little on commercial revenue. Commercial and other sponsorship may also show that the station is serving community needs. Since there is much at risk, commitment of ownership to a format is a strong indicator that the format will be serving community needs, an essential component for success.

Compelling participation with Advisory Boards would create hardships for

smaller stations. Such stations, which are usually managed closer to home and may already have a better sense of connection with their audience, often operate on very limited budgets. Advisory Boards would require commitment of more staff to analysis and implementation of Board recommendations and compliance paperwork while distracting them from proven interests of the radio audience. While Advisory Boards and other proposed reporting efforts would generate unnecessary additional expense, their benefits to listeners, if any, would be marginal.

The power of the Advisory Board to impose upon station management, which is implied by the compulsion to participate in the process, would introduce a political aspect to the task of good station programming and could intimidate management to bend to the strongest or most threatening voice rather than toward the best use of the broadcast facility in accord with management's own experience and good purposes. While compulsion is appropriate in some technical areas of broadcasting, it is not a good option in such a subjective area as format decisions.

The Advisory Board concept implies that individual stations should attempt to meet the needs of "all segments of the community". To define the various "segments of the community" and choose a representative of each is fraught with insurmountable problems, no matter who does it. Some defined segments of the community may actually be incompatible with the tone or intent of some established formats; why should their interests be forced into such a setting? The Advisory Board concept does not fit well with the ideas of niche formatting, targeted audiences, or ministry oriented programming and would infringe upon the preferences of widely divergent audiences who choose a station because they like it quite as it is. This imposition on the station/listener relationship could represent an assault on the cherished concept of freedom of expression and speech. Some listeners simply prefer minimal public affairs or public service type of programming, etc.

No endeavor in any setting can hope to serve or satisfy everybody in a community. Compulsory Community Advisory Boards are a bad idea, especially for small stations like KBGN which have faithfully served our communities for nearly five decades, not for the limited monetary gain, but because we have a love and commitment for sharing messages and music of hope and joy to faithful listeners who love what we do and how we do

it.

While the public could benefit from a more informative and navigable FCC website, making broadcasters steer a new course of compliance obstacles in our daily operations or at renewal time will simply make expensive work for stations while doing little for the listeners who simply want to tune in their favorite stations and enjoy. Radio listeners let their interests be known every day, either by direct expression to station personnel or by tuning out; should some arbitrary board be dictating what they need to hear by subtly or otherwise imposing their ideas upon station management? We think not. Please don't make our task more complicated and difficult by imposing rules which presume that some compulsory board will know more about meeting the needs of our audience than do we who have faithfully served them for so long.

Respectfully submitted,

Nelson M. Wilson  
KBGN AM1060  
3303 E. Chicago St.  
Caldwell, ID 83605

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gt;Nelson
M. Wilson<BR>&lt;ADDRESS1&gt;3303 E. Chicago
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on proposed Advisory

Boards<BR>&lt;CONTACT-EMAIL&gt;kbgn@kbgnradio.com<BR>&lt;TEXT&gt;Honorable

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